Before the Federal Communications Commission Washington, D.C.

235	In the Matter of)	Docket WT 05-
	Notice of Proposed Rule Making Amendment of Part 97 of FCC Amateur Service Rules to Eliminate Morse Code Testing)	
	Comments of David E. Heil K8MN		

<u>Introduction</u>

My comments are in response to WT-05-235, in opposition to the proposed removal of morse code testing in the Amateur Radio Service.

My background in communications includes working in the broadcast field at stations WAEZ-FM and WAEF-FM, four years in the U.S. Air Force operating a wide range of high power SSB equipment at SAC's Alfa and Bravo Nets in the U.S. and as radio operator for the 834th Air Division in the Republic of Vietnam. Most recently, I completed a career in communications in the Foreign Service with six U.S. Embassy postings. I was first licensed in amateur radio in 1963 and was issued an Amateur Extra Class license in 1977.

I see no need for the elimination of morse code testing at the General or Extra Class levels in amateur radio. The morse code continues to be the second most highly used mode of operation in HF amateur radio. It also sees widespread use for weak signal work at VHF and UHF.

I understand the desire to change things in the interest of modernization, regardless of whether the "modernization" has positive or negative results. I've seen the desire manifested in private industry and in government. For a couple of decades, there's been a general trend toward reducing the requirements for entering many endeavors. It has been my observation that when these reductions in requirements are implemented, the result has often been to move toward chaos.

Pro retention of morse testing

Opponents of continued morse testing have sometimes said that no other radio service uses morse code. That is correct, but it doesn't account for the fact that morse code is in regular use by tens of thousands of radio amateurs worldwide on a daily basis. The very word "amateur" means "for the love of". We radio amateurs enjoy radio for the sake of radio. We are both a technical service and service whose licensees pride themselves on operating skills. Commercial services concern themselves with the bottom line. The Maritime Service has all but done away with skilled operators in efforts to reduce manpower costs.

There are a number of digital modes in use in amateur radio. Each of them depends upon the use of additional equipment or a personal computer. Morse code use does not require this additional equipment. It can be decoded and encoded by human brain power.

It was claimed that the offering of a code-free Technician Class license would result in the influx of "otherwise qualified" technically oriented individuals to amateur radio. This hasn't taken place. It seems evident that the morse code exam wasn't the "hazing ritual" or "jumping through hoops" which prevented individuals from entering amateur radio.

A five word per minute morse test isn't enough to establish one as a skilled morse operator but I believe that this test, which is in reality not much more than a morse recognition exam, is a necessity for HF access to amateur radio.

Respectfully submitted,

David E. Heil